

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262-NRB ECF Case
THE BERKSHIRE BANK and GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO Individually and On Behalf of All Others Similarly Situated, Plaintiffs, v. BANK OF AMERICA CORPORATION, et al., Defendants.	Civil Action No. 12-CV-5723-NRB

**LENDER PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF
SETTLEMENTS WITH CITIBANK, HSBC BANK PLC AND BARCLAYS BANK PLC**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE, that on December 20, 2018, at 11:00 AM, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, Lender Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (a) granting final approval to the Settlements with Citibank, N.A and Citigroup Inc. (collectively, “Citibank”), HSBC Bank plc (“HSBC”) and Barclays Bank PLC (“Barclays”); (b) certifying the Settlement Class; (c) granting final approval to the plan of distribution; (d) appointing Pomerantz LLP as Counsel for the Settlement Class; (e) granting final approval to the class notice, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Citibank, HSBC and Barclays are: (i) the Memorandum of Law in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Citibank, HSBC and Barclays; (ii) the Declaration of Jeremy Lieberman A. Lieberman in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements with Citibank, HSBC and Barclays; (iii) the Declaration of Jennifer M. Keough in Support of Lender Plaintiffs’ Motion for Final Approval of Settlements.¹

Dated: November 6, 2018

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman
Michael J. Wernke
Veronica V. Montenegro

Counsel for the Lender Plaintiffs

¹ Lender Plaintiffs will submit a Proposed Order after the opt-out and objection deadline (November 20, 2018) and in advance of the Fairness Hearing (December 20, 2018).

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2018, I caused the foregoing, along with the accompanying memorandum and declarations in support, to be electronically filed with the Clerk of the Court using CM/ECF system, which will automatically send email notification of such filing to the attorneys of record registered in the CM/ECF system.

November 6, 2018.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman